

## INTRODUCTION:

The Low Power AM Radio Petition affords the opportunity for those LPFM candidates and other potential qualified broadcasters and organizations to be included in offering a service to their respective communities.

The Radio Industry has changed dramatically since I began my professional broadcast career in 1978. At that time, most stations were owned by small business and operated purely in the community's interest as the station was required to do so in order to remain solvent.

In 1978, radio offered entry-level opportunities. Today there are few options to those choosing radio as a career. I refer to small market radio as the 'farm team', borrowing a term from baseball. Here entry level players honed skills and perfected their game in hopes of earning a spot in the major league. Today satellite and computers have pretty much done away with the 'farm team'. The expenses of operating a radio station leave little monies for quality community service, for which the license is granted. With such high prices paid for a frequency by auction, sale prices for existing stations are so high, it is difficult to serve the public effectively and secure a salary much above the McDonald's employee.

Low Power FM, while still a true pioneer in the radio realm, offers hope as does the Low Power AM proposal at hand. LPFM and LPAM are the 'farm team' for radio as it struggles to find new talent to replace the aging major leaguers.

## NUMBER OF STATIONS PER OWNER

The petition states one frequency per owner in the Metropolitan Statistical Area or MSA. I feel this is fair. By no means should this extend further than the 'home' counties of the 'metro'. The total number of stations, I feel should be around 20 in lieu of 12. This offers greater availability to develop a more financially stable arena. If one should choose to service an area or region of a state, a larger group of stations allows the smallest of communities to enjoy their own radio service.

## OWNERSHIP QUALIFICATIONS including residency requirements

The whole purpose of LPAM is to introduce the opportunity for new broadcasters. Those who already hold a license, therefore, should not be included as candidates for a LPAM license.

Licensees should be individuals, organizations and non-profit groups.

I agree the potential licensee should pledge to reside in or near the community of license for their

primary station (in the event they choose to own more than one station). I recall a check box on the old applications where the applicant could pledge to be 'involved in the day to day operation of the station'. This can be substituted for residency requirements. This excellent 'pledge' says more than just being a resident, but indicates 'hands on' involvement.

## BONUS POINTS

A potential licensee should be afforded an opportunity to 'better their chances' by being able to claim:

- 1) the first broadcast station
- 2) involvement in day to day operation of station
- 3) locally produced programming tailored to the community

## REVIEW ON LPAM

The FCC should have in place a system of reviewing each class of station to determine if the goals of the FCC are being met. Public Comment and Licensee Comment should be a part of this review.

## COMMERCIAL OPERATION

I understand commercial operation requires auctions to award frequencies. A request from Congress to waive LPAM stations from auction should be requested. I would not object to an annual spectrum use fee to offset the financial obligations of overseeing the LPAM operation.

## FREQUENCY AUCTIONS

LPAM should be free from mandatory license auctions. If Congress does not agree to waive LPFM from auction, then LPAM should be restricted to non-profit status/hobby status with commercial-styled announcements permitted to defer operating expenses. Perhaps a limit on the amount of time within the average hour for generating revenue should be placed in to the rules (remember when commercial stations were limited to 18 minutes per hour on average?).

## TIME SHARING / MUTUALLY EXCLUSIVE

I think Time Sharing is a bad idea. It should be voluntary only, not forced.

If there are mutually exclusive applicants, they should be afforded a reasonable amount of time to work out a solution agreeable to the FCC. This would come after a 'bonus point' determination. Most such situations would be avoided by a 'bonus point' system.

## STATION OPERATING HOURS

All LPAM should be 24 hour facilities. Minimum operating hours as per full power stations should be observed. As the LPAM, according to the petition, would be below 250 watts at night, nighttime operation should be optional, as it is for full power stations.

## FILING WINDOWS

I encourage the FCC to have regularly scheduled filing windows for new licenses and major and minor changes. Each window should be with a 90 day notice and open at least 30 days. My fear is the mad rush of a quickly announced window overworks engineers and potential applicants leading to errors and missing information. With proper advance notice, the FCC's time is better utilized with better prepared, more complete applications.

## THE CASE FOR A COMMERCIAL LOW POWER AM SERVICE

I fully agree with the petitioner. I manage a radio station. I have worked in several markets in the sales side of radio. I know how the smaller businesses cannot afford an adequate advertising schedule on most stations. Even in small communities, I simply could not offer the business spending \$80.00 to \$90.00 a month a worthwhile advertising package. If they could double their outlay, we were in the ballpark. Thus, the operation of even a small market full power station required such efficient use of my time that the true Mom and Pop business could not afford my station. LPAM offers the opportunity for the small business to obtain adequate advertising at a price within their budget.

We understand the small business is the majority of businesses in America. They are the fulfillment of the American Dream and the backbone of the country. They are the ones who employ more Americans. It is 'right' for them to be allowed to sustain themselves and grow, in much the same way it is 'right' for the FCC to bring radio back to the small business via LPAM. After all, the small business has only a few options: the business directory in the neighborhood newspaper or the scrolling text on the cable system message channel.

## ADDITIONAL COMMENTS

I shall remain silent on power levels and other engineering practices for LPAM as the engineer is more qualified than I, in sharing such technical information.

## SUMMARY

Realizing a dream is one way to describe the opportunity you can offer by allowing LPAM. I urge you not to be swayed by full power broadcast organizations. They simply do not realize LPAM and LPFM is the key to their survival. So many full power broadcasters are furious 'if they can't have it all'. In other words, if they lose one listener or must share one advertiser with another, they're seeing red. The fact is LPAM, like LPFM, goes after the small business for support. The full power broadcaster has no gripe. LPAM would not take their revenue and in the full spirit of competition, if the full power station offers a great service to their community, they needn't worry about losing listeners.

Thank you for the opportunity to share these thoughts. I urge you to create a Low Power AM Radio Service the mom and pop business can afford.